

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS  
ANTITRUST LITIGATION

This document relates to:

ALL INDIRECT PURCHASER ACTIONS

CASE NO. 3:10-md-2143 RS

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING MODIFIED  
BRIEFING SCHEDULE AND HEARING  
DATE FOR INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

DATE ACTION FILED: Oct. 27, 2009

WHEREAS, on April 29, 2015, this Court entered a Stipulation and Order Regarding Modified Briefing Schedule for Class Certification on Behalf of Indirect Purchaser Class (“April 29, 2015 Scheduling Order”) (Dkt. 1591);

WHEREAS, the April 29, 2015 Scheduling Order contemplated an additional request for a reasonable extension to the class certification briefing schedule;

WHEREAS, Indirect Purchaser Plaintiffs (“IPPs”) and Defendants have discussed and agreed to a two-week extension for Defendants’ filing of their opposition to IPPs’ motion for class certification, and an additional one-week extension for IPPs’ filing of their reply brief;

WHEREAS, the parties jointly request this modified briefing schedule in order to present their arguments on class certification as clearly and concisely as possible; and

WHEREAS, in light of this requested modification to the briefing schedule, the parties believe that the hearing date on IPPs’ motion should also be moved, and have agreed to October 16, 2015 at 10:00 am, or such other date as the Court prefers;

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties, subject to Court approval, that the briefing and hearing schedule for IPPs’ renewed motion for class certification shall be modified as follows:

Event	Date in April 29, 2015 Scheduling Order	<del>Proposed</del> New Date
Deadline for Defendants to file Joint Opposition to IPPs’ Revised Motion for Class Certification	Friday, July 31, 2015	Friday, August 14, 2015
Deadline for IPPs to file Reply in Support of Revised Motion for Class Certification	Friday, August 28, 2015	Friday, September 18, 2015
Hearing on Revised Motion for Class Certification	Friday, September 25, 2015 at 10:00 a.m.	Friday, October 16, 2015 at 10:00 a.m., or at the Court’s convenience

IT IS SO STIPULATED.

1 DATED: June 19, 2015

HAGENS BERMAN SOBOL SHAPIRO LLP

2 By /s/ Shana E. Scarlett  
3 SHANA E. SCARLETT

4 Jeff D. Friedman (173886)  
5 715 Hearst Avenue, Suite 202  
6 Berkeley, CA 94710  
7 Tel: 510-725-3000  
8 Fax: 510-725-3001  
9 jefff@hbsslaw.com  
10 shanas@hbsslaw.com

11 Steve W. Berman (*Pro Hac Vice*)  
12 George W. Sampson (*Pro Hac Vice*)  
13 HAGENS BERMAN SOBOL SHAPIRO LLP  
14 1918 Eighth Avenue, Suite 3300  
15 Seattle, WA 98101  
16 Tel: 206-623-7292  
17 Fax: 206-623-0594  
18 steve@hbsslaw.com  
19 george@hbsslaw.com

20 *Interim Lead Counsel for Indirect Purchaser*  
21 *Plaintiffs*

22 DATED: June 19, 2015

LATHAM & WATKINS LLP

23 By /s/ Belinda S Lee  
24 BELINDA S LEE

25 505 Montgomery Street, Suite 2000  
26 San Francisco, CA 94111  
27 Tel: 415-395-8240  
28 Fax: 415-395-8095  
belinda.lee@lw.com

*Attorneys for Defendants Toshiba Samsung Storage*  
*Technology Korea Corporation, Toshiba Samsung*  
*Storage Technology Corporation, and Toshiba*  
*Corporation*

29 DATED: June 19, 2015

WINSTON & STRAWN LLP

30 By /s/ Robert B. Pringle  
31 ROBERT B. PRINGLE

32 101 California Street  
33 San Francisco, CA 94111-5894  
34 Tel: 415-591-1000  
35 Fax: 415-591-1400

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: June 19, 2015

rpringle@winston.com  
*Attorneys for Defendant NEC Corporation*  
ROPES & GRAY LLP  
By /s/ Mark S. Popofsky  
MARK S. POPOFSKY  
One Metro Center  
700 12th Street NW, Suite 900  
Washington, DC 20005-3948  
Tel: 202-508-4600  
Fax: 202-508-4650  
mark.popofsky@ropesgray.com  
*Attorneys for Defendants Hitachi-LG Data Storage,  
Inc. and Hitachi-LG Data Storage Korea, Inc.*

DATED: June 19, 2015

BAKER BOTTS LLP  
By /s/ Evan Werbel  
EVAN WERBEL  
1299 Pennsylvania Ave. NW  
Washington, DC 20004  
Tel: 202-383-7199  
Fax: 202-383-6610  
evan.werbel@bakerbotts.com  
*Attorneys for Defendants Koninklijke Philips N.V.,  
Lite-On IT Corp. of Taiwan, Philips & Lite-On  
Digital Solutions Corp., and Philips & Lite-On  
Digital Solutions U.S.A., Inc.*

DATED: June 19, 2015

DICKSTEIN SHAPIRO LLP  
By /s/ Lisa M. Kaas  
LISA M. KAAS  
1825 Eye Street NW  
Washington, DC 20006  
Tel: 202-420-2200  
Fax: 202-420-2201  
kaasl@dicksteinshapiro.com  
*Attorneys for Defendants BenQ Corporation and  
BenQ America Corp.*

1 DATED: June 19, 2015

O'MELVENY & MYERS LLP

2 By /s/ Ian Simmons  
3 IAN SIMMONS

4 Ian Simmons  
5 James M. Pearl  
6 1625 Eye Street NW  
7 Washington, DC 20006  
8 Tel: 202-383-5106  
9 Fax: 202-383-5414  
10 isimmons@omm.com  
11 jpearl@omm.com

12 *Attorneys for Defendants Samsung Electronics Co.,*  
13 *Ltd. and Samsung Electronics America, Inc.*

14 DATED: June 19, 2015

BOIES SCHILLER & FLEXNER LLP

15 By /s/ John F. Cove, Jr.  
16 JOHN F. COVE, JR.

17 1999 Harrison Street, Suite 900  
18 Oakland, CA 94612  
19 Tel: 510-874-1000  
20 Fax: 510-874-1460  
21 jcove@bsflp.com

22 *Attorneys for Defendants Sony Corporation, Sony*  
23 *Optiarc America, Inc., and Sony Optiarc Inc.*

24 DATED: June 19, 2015

VINSON & ELKINS LLP

25 By /s/ Craig P. Seebald  
26 CRAIG P. SEEBALD

27 2200 Pennsylvania Ave. NW  
28 Suite 500 West  
Washington, DC 20037-1701  
Tel: 202-639-6500  
Fax: 202-879-8950  
cseebald@velaw.com

*Attorneys for Defendant Hitachi, Ltd.*

DATED: June 19, 2015

KATTEN MUCHIN ROSENMAN LLP

By /s/ Mary Ellen Hennessey  
MARY ELLEN HENNESSEY

Mary Ellen Hennessey

Aharon S. Kaye  
525 West Monroe Street  
Chicago, IL 60661-3693  
Tel: 312-902-5200  
Fax: 312-902-1061  
maryellen.hennessy@kattenlaw.com  
aharon.kaye@kattenlaw.com

*Attorneys for Defendant TEAC Corporation and  
TEAC America Inc.*

DATED: June 19, 2015

EIMER STAHL LLP

By /s/ Nathan P. Eimer  
NATHAN P. EIMER

224 South Michigan Avenue, Suite 100  
Chicago, IL 60604  
Tel: 312-660-7601  
Fax: 312-692-1718  
neimer@eimerstahl.com

*Attorneys for Defendant LG Electronics, Inc. and  
LG Electronics USA, Inc.*

DATED: June 19, 2015

JONES DAY

By /s/ Eric P. Enson  
ERIC P. ENSON

555 South Flower Street, Fiftieth Floor  
Los Angeles, CA 90071  
Tel: 213-489-3939  
Fax: 213-243-2539  
epenson@JonesDay.com

*Attorneys for Defendant Pioneer Electronics (USA)  
Inc., Pioneer North America, Inc., Pioneer  
Corporation, and Pioneer High Fidelity Taiwan  
Co., LTD.*

DATED: June 19, 2015

WINSTON & STRAWN LLP

By /s/ Jeffrey L. Kessler  
JEFFREY L. KESSLER

200 Park Avenue  
New York, NY 10166  
Tel: 212-294-6700  
Fax: 212-294-4700  
jkessler@winston.com

*Attorneys for Defendant Panasonic Corporation  
and Panasonic Corporation of North America*

DATED: June 19, 2015

DRINKER BIDDLE & REATH LLP

By /s/ Keith A. Walter Jr.  
KEITH A. WALTER JR.

222 Delaware Avenue, Suite 1410  
Wilmington, DE 19801  
Tel: 302-467-4200  
Fax: 302-467-4201  
keith.walter@dbr.com

*Attorneys for Defendant Quanta Storage Inc.*

**IT IS SO ORDERED.**

DATED: 6/19/15

  
HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT COURT JUDGE

**ATTESTATION OF CONCURRENCE IN THE FILING**

Pursuant to Civil Local Rule No. 5-1(i)(3), I declare that concurrence has been obtained from each of the above signatories to file this document with the Court.

/s/ Belinda S Lee  
BELINDA S LEE